INTRODUCTION

On July 3, 1996, AT&T met with Department of Interior (DOI) representatives to begin consultation concerning a forthcoming proposal to remove portions of a coaxial cable and associated equipment on lands under the jurisdiction of the National Park Service (NPS) and the Bureau of Land Management (BLM) in New Mexico, Nevada, and California. This communication system, known as the Phillips 140 (P140) cable system, consists of cable, repeater huts, manholes, marker posts (MPs), associated electronic equipment, and an access corridor. Because the P140 system is not supportive to AT&T's fiber optic network, requires ongoing maintenance and patrols, and is an unnecessary encumbrance on the land, AT&T has proposed to remove cable and equipment within a 220-mile portion of the system. Because the NPS and the BLM will need to establish the parameters of any removal action on federal land, the requirements of the National Environmental Policy Act (NEPA) apply. County and state agencies in California in the project area were contacted regarding the requirements of the California Environmental Quality Act (CEQA) and none of the contacted agencies have indicated that they would exercise CEQA jurisdiction (Orcutt 1996, Chmiel 1996, Sansonetti 1996).

On July 17, 1996, the DOI determined that the NPS would the lead agency and that the BLM would be a cooperating agency to implement the requirements of the NEPA. Between July, 1996 and March, 1997, AT&T continued their environmental background investigations and finalized its project proposal concerning the P140 system.

On March 9, 1997, AT&T's proposal and environmental report were submitted to the NPS and BLM. In addition to receiving AT&T's proposal to remove cable and equipment, the NPS and the BLM were notified of AT&T's intent to relinquish associated rights of way for the system, in whole or in part, where removal of cable occurs. Rights of way for the system were originally granted between 1963 and 1966 by the underlying owners of federal, state, and private lands.

As a result of the agencies' review of AT&T's proposal and environmental report, it was determined that the project has the potential to cause significant environmental impacts and an Environmental Impact Statement (EIS) would be necessary.

In June 1997, public scoping for the Draft EIS (DEIS) was conducted, including public meetings in Laughlin, Nevada and Barstow, California.

PURPOSE AND NEED FOR GOVERNMENT ACTION

Approximately 58 percent of the 220-mile project traverses lands under the jurisdiction of the NPS and the BLM (See Figure 1: P140 Project Route). As resource trustees of lands affected by AT&T's proposal, these agencies are responsible for determining the terms and conditions of any removal activities that may occur. Also, as administrators of the AT&T rights of way, these agencies are required by their respective regulations to specify the conditions for terminating the rights of way that, when implemented, would restore the land to their satisfaction.

The purpose of this draft EIS (DEIS) is to begin to develop and analyze the terms and conditions for removal of cable and equipment, and for termination of easements. Following completion of the final EIS, the Record of Decision, and associated public review and comment periods, the NPS and the BLM will incorporate conditions into their individual permits for the project. These permits are the federal action for the project; they will specify how and where cable and equipment removal will occur and how the rights of way on federal lands will be terminated. A chronology of events leading up to issuance of the permit is shown in Figure 2.

In summary, the NPS and the BLM have determined that federal action is necessary to ensure the project meets the following objectives:

- Eliminates an unnecessary utility right of way.
- Minimizes the residual impacts of the right of way and any associated improvements on Preserve and public land resources.
- Promotes the restoration of Mojave National Preserve lands consistent with the long-term goals of preservation (under NPS jurisdiction).
- Promotes the restoration of public lands consistent with the long-term goals of conservation (under BLM jurisdiction).
- Responds to AT&T's request for termination and proposed removal project
- Provides terms and conditions for termination of AT&T rights of way on federal lands

In addition, the agencies are required to ensure that any action undertaken as part of this project complies with the following:

- NPS and BLM right-of-way authorizations and regulations regarding termination of rights of way.
- The Federal Endangered Species Act (16 U.S.C. 1531, et seq.) and the California Endangered Species Act (California Fish and Game Code 2050).
- The National Historic Preservation Act (16 U.S.C. 470[f]) and the Wilderness Act (16 U.S.C. 1131, et seq.).
- Executive Order 12898 on Environmental Justice.
- All other applicable laws and regulations.

This DEIS identifies the federal agencies' Proposed Action, the range of alternatives considered, the affected environment, and impacts associated with no action and the action alternatives.

APPLICANT'S PURPOSE AND NEED

The P140 system is non-supportive to the current fiber optic telecommunications network, requires ongoing maintenance and patrols, and is an unnecessary encumbrance on the land. It also presents an environmental concern from ongoing impacts such as predation of young desert tortoises by ravens that perch on cable marker posts.

AT&T's nationwide communications goals and their purpose and need for this project are to contain and reduce costs by:

- relinquishing existing P140 cable corridors not currently scheduled for use in fiber optic upgrades or diversification;
- removing facilities that could cause unforeseen liability costs; and
- removing maintenance costs on those facilities (including annual fees, patrols, etc.).

AT&T budgeted and scheduled this removal project for 1997-1998 and funds may not be available after 1998. Funding levels for removal projects are determined in large part by federal tax and depreciation considerations and geographic location. Therefore, AT&T has indicated that its costs for this removal project must meet their cost containment goals that include planning, environmental reviews, permitting, construction, and monitoring.

In addition, AT&T has proposed that any action undertaken as part of the project complies with the following:

- coaxial cable and facilities are removed only where parallel fiber optic systems are not in jeopardy of disruption;
- easements are relinquished, in whole or in part, only where cable is removed; and
- access for on-going maintenance of fiber optic systems and coaxial cable left in place would continue.

EXISTING P140 SYSTEM COMPONENTS

AT&T owns and maintains 709 miles of coaxial communications cable and equipment between Socorro, New Mexico, and from Laughlin, Nevada, and Mojave, California. This project only concerns 220 miles of this system, including approximately 7.7 miles in New Mexico, 7.4 miles in Nevada, and 205.2 miles in California. This system consists of cable, repeater huts, manholes, MPs, associated electronic equipment, and an access corridor. The analog and, later, digital signals were transmitted over copper wire conductors. The P140 cable system includes the following:

Cable — The coaxial cable is approximately 2.5 inches in diameter (see Figure 3: Cross Section of Coaxial Cable). The center of the cable consists of paper filler. Twelve copper conductor pairs surround the center. The inner conductors are copper surrounded by stainless steel. The conductor pairs are encased by a wax layer, then a lead casing, a stainless steel layer, and a polyethylene sheath. The cable is buried at depths usually ranging from 4 to 5 feet, but in certain areas, the depths can reach 12 feet. At certain crossings (i.e., roadways, railroads, and large washes), the cable is housed in a steel or polyvinyl chloride (PVC) pipe. The cable weighs approximately 7 pounds per foot.

Cable Easement — The layout of the cable easement, the cable, and the access corridor are shown on Figure 4. The cable right of way is usually 20 feet wide (located 10 feet on either side of the MP); the New Mexico segment is 30 feet wide. The cable location is characterized by a mound, typically 3 feet wide and 1 foot high (see Figure 5).

Repeater Huts — Metal repeater huts, located every 4 miles along the route, are situated on separate 100-foot by 100-foot sites. Each hut houses a belowground vault, which is 14 feet long, 7.25 feet wide, and 8 feet deep (see Figures 6 and 7). The vaults currently contain light fixtures, ladders, cable racking, and equipment for communication transmission (Gorman 1997).

P140 Manholes — These manholes are 8 feet long, 4 feet wide, and 6.5 feet deep (see Figure 6), are located every 4 miles along the easement, and are evenly staggered between the repeater huts. The manholes presently contain light fixtures, ladders, cable racking, and electronic equipment (Gorman 1997).

Marker Posts — Cable MPs are positioned along the route to locate the underground cable and warn the public of its presence. These MPs are 6-inch-diameter, treated wood posts, approximately 12 to 14 feet long, that protrude 8 to 10 feet above ground. The MPs are labeled with orange signs and have been placed at intervals of approximately 1,400 feet, or on line-of-sight. The MPs indicate cable direction changes, road crossings, railroad crossings, crossings of desert washes and dry creeks, and repeater hut locations. The MPs are labeled in a numeric sequence, but do not indicate mileage.

Access Corridor — An unpaved dirt/gravel corridor parallels the cable route in Nevada and California (see Figure 5). The corridor is usually within 50 feet of the cable right of way, but diverges from the easement in several areas because of topography. Segments of the access corridor have multiple users, including recreational users, private landowners, grazing right holders, government agencies, as well as the applicant. AT&T will continue to use this access corridor to maintain a fiber optic line that is parallel to portions of the P140 system segments in Nevada and California. The P140 coaxial cable and the fiber optic line are parallel for approximately 5.7 miles in Nevada and 38.9 miles in California.

ISSUES AND CONCERNS

Issues and concerns are those environmental problems associated with the alternatives including the Proposed Action, if it is implemented. Some of the environmental problems are temporary, not lasting longer than the construction period; others are longer-term, lasting 5 years or more. Issues were identified during a 30-day public scoping period, at public meetings and Northern and Eastern Mojave (NEMO) planning meetings, and as a result of agency consultation between the NPS, the BLM, and the U.S. Fish and Wildlife Service (USFWS). Potential environmental impacts associated with the project were also identified in AT&T's Environmental Report, dated March 21, 1997 (E & E 1997). All of the issues identified in the Environmental Report are included in this DEIS.

Cable removal activities would have potentially significant and unavoidable temporary, short-term, and long-term environmental impacts. The most significant environmental issues concern their affects on desert vegetation and the desert tortoise, a federally threatened species. Other potentially significant issues include the impact of construction on air quality, wilderness areas, and visual aesthetics. An additional issue concerns eliminating recreational access to open areas of the Mojave Desert. Each of these issues is summarized below.

Desert Vegetation

Removal of the cable would result in disturbance of approximately 423 acres of desert vegetation along the right of way. This vegetation was originally removed during installation of the cable in the 1960s, and has been allowed to recover for more than 30 years. As a result, vegetation has begun to reestablish along the right of way, although the density of vegetation is still less than in surrounding areas and large plant species, such as Joshua trees, yuccas, and cacti, are mostly absent. Concerns have been raised that removal of the buried cable would damage existing vegetation, thereby retarding the recovery process, which could take 20 to 50 years. Disturbance of the right of way and

access corridor could introduce exotic species along the project route. Detailed analysis and mitigation for impacts to desert vegetation are discussed in the Impacts section.

Desert Tortoise

Removal of the cable would disturb approximately 212 acres of critical habitat for the desert tortoise, possibly resulting in tortoise mortality because of contact with construction equipment or entrapment in burrows. Concerns have been raised that removal of buried cable would result in the destruction of burrows in the existing cable mound and removal would eliminate vegetation used by the tortoise for cover and forage. Cable removal and rehabilitation activities could spread exotics, thereby reducing preferred forage for the desert tortoise. Based on these concerns, alternatives have been developed to reduce these impacts. Detailed analysis and mitigation for impacts on desert tortoise and critical habitat are discussed in the Impacts section.

Air Quality

The project route in California is within a non-attainment area for several air pollutants including dust, which is known as PM10. Concerns have been raised about the impact from construction-generated emissions, including dust, on air quality.

Wilderness

The project route crosses designated wilderness areas within the Mojave National Preserve, and the Proposed Action would require mechanized equipment and travel in these areas. Because the Wilderness Act generally prohibits vehicle travel, concerns have been raised about how and whether removal and rehabilitation activities should occur in wilderness areas. As noted above, removal of the buried cable in wilderness areas would damage existing vegetation, retard the recovery process, and could introduce exotic species along the project route.

Visual Aesthetics

The project route crosses several significant natural scenic areas. Depending on air quality, the features associated with the existing P140 system, such as the access corridor, can be seen from up to 10 miles away. As noted above for desert vegetation, concerns have been raised that removal of cable and associated vegetation would create a barren strip. The vegetation along the strip could take 20 to 50 years to recover and blend in with the surrounding landscape.

Recreational Access

Concerns have been raised that recreational access to open desert areas could be restricted by eliminating portions of the access corridor.

Future Concerns

Concerns have been raised that not removing cable and equipment could have future significant impacts. Removal of cable and equipment by AT&T presently would:

- avoid the possibility that the government would need to conduct maintenance or cable removal activities itself;
- avoid delaying the initiation of the vegetation recovery process beyond the 20 - 50 year recovery period currently estimated for the action alternatives;
- eliminate the possibility for unauthorized mining of buried cable should copper become more valuable than at present; and
- eliminate the possibility of a future release of cable-related constituents, such as lead, to the environment should soil conditions change.